

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION, W.D. of VA  
HARRISONBURG DIVISION

UNITED STATES OF AMERICA :  
 :  
 v. : Case No. 5:19CR17 (EKD)  
 :  
 FRANK JESSE AMNOTT :

**STATEMENT OF OFFENSE**

The offenses described below occurred within the Western District of Virginia, as well as other districts. This Statement of Facts briefly summarizes the facts and circumstances surrounding the defendant's criminal conduct. It does not contain all of the information obtained during this investigation and applicable to an accurate Presentence Report and Sentencing Guidelines calculation.

This statement of facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial in the event this plea is later withdrawn notwithstanding any Rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410, and Federal Rule of Criminal Procedure 11.

**I. Background**

In or about the year 2014, the defendant Frank Amnott and his wife Jennifer Amnott met Valerie Perfect Hayes ("Hayes") through a mutual friend. Over the years, the Amnotts became very close and personal friends with Hayes, and at times, they lived together. Throughout this relationship, Hayes consistently claimed to the Amnotts that she worked for the government, and frequently, these claims would include that she worked in intelligence services or in some clandestine capacity.

Throughout their marriage, Frank and Jennifer Amnott tried to have children without success. All of their pregnancies resulted in miscarriages, and Hayes knew of the difficulty the Amnotts were having in conceiving. Hayes told the Amnotts that she could facilitate their adoption of a child and that her occupation provided her with access to children who were victims of abuse or neglect. In several instances, Hayes told the Amnotts she had arranged for the Amnotts to adopt a child. None of those adoptions ever materialized.

As of July 2018, the Amnotts resided in the State of Florida, and Hayes resided in the State of Maryland with her boyfriend Gary Blake Reburn ("Reburn"). Hayes had claimed to

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Frank and Jennifer Amnott that three of her children – allegedly named Ronin, Leona, and Zippy – had been kidnapped and were currently in the custody of two separate families that were residing in a Mennonite community in rural Virginia. Hayes told the Amnotts that she needed their help to recover them, and the Amnotts agreed. In mid-July 2018, the defendant, Frank Amnott, and Jennifer Amnott traveled from Florida to Maryland. Once in Maryland, Hayes told the Amnotts they could keep one of the other children after the abductions. The Amnotts named their anticipated child “Caleb.”

The children that were the object of the kidnappings resided at two separate houses located in Dayton, Virginia, a rural Mennonite community in the Western District of Virginia. “Ronin” (Child #1) resided at the first house, along was a second younger child – an infant – which also was going to be abducted (Child #2). “Zippy,” “Leona,” and “Caleb” (Child #3, Child #4, and Child #5, respectively) resided at the second house.

## **II. July 27, 2018 – Travel from Maryland to Virginia and Surveillance**

On July 27, 2018, Hayes and defendant Frank Amnott drove from Maryland to Virginia in a silver Mercedes SUV and surveilled the two families throughout the day. As part of this surveillance, and to remain in contact with Jennifer Amnott, the defendant and Hayes used their cell phones.

According to their plan, Hayes and defendant Frank Amnott would wait until the early morning when the fathers at each house left to milk their cows. Hayes and the defendant would enter the first house and hold the wife at gunpoint while the other secured Child #1 and Child #2. Once the children were secured in the vehicle, Amnott or Hayes would take the wife to a separate location and execute her by shooting her in the head. Amnott or Hayes would then either go to the barn – or wait for the father’s return from the barn – at which point they would execute the father as well. At the second house, Hayes and Amnott would do the same. They would take the three youngest children – Child #3, Child #4, and Child #5 – and execute the parents in the same manner. Hayes told Amnott there were two older, male children at the second house that they would not abduct. Rather, they would put them to sleep by drugging them and then lock them in their room. If, for some reason, the opportunity to enter the home did not present itself when the fathers left to milk the cows, then Hayes and the defendant had a back-up plan in which they would drug the parents to simulate and create the false appearance of an overdose death. In killing the parents at both houses, the defendant and his co-conspirators sought to eliminate witnesses to the abductions. Afterwards, all of the children would be taken from Virginia to Maryland, and the Amnotts then would leave with “Caleb.”

While Hayes and the defendant were in Dayton, Virginia, Jennifer Amnott remained in Maryland where she was watching Hayes’ other children. During this time, Jennifer Amnott remained in consistent contact by text message with the defendant and Hayes, asking for updates as to the timing.

### **III. July 28, 2018 – Travel Back to Maryland and Return to Virginia**

The next morning, on July 28, 2018, Hayes and the defendant waited outside of the first house, armed with firearms. As they watched and waited, an individual who they perceived to be a “hired hand” showed up to help milk the cows. This was an unexpected turn of events, and Hayes and the defendant decided they would wait. According to Hayes, there were additional adults present at the second house as well. Hayes and the defendant decided they needed additional help and drove back to Maryland to enlist the help of Reburn, Hayes’ boyfriend.

Reburn agreed, and on the afternoon of July 28, 2018, Reburn, Hayes, and the defendant drove back to Virginia. Jennifer Amnott remained with Hayes’s children in Maryland. On the way, Hayes changed and disguised herself in Mennonite clothing, to include a dark-color full length dress and a head covering.

The plan to effectuate the kidnapping and murders had changed, now that Reburn was had joined. The three would enter the first house and the defendant would hold the parents at gunpoint. After the two children were secured by Hayes, Reburn would execute both parents by shooting them in the back of the head with his firearm. They would then drive to the second house, traverse the next-door neighbor’s driveway (who they knew from surveillance was not home), and force entry into the house. Reburn and the defendant would hold the father at gunpoint, and Hayes would force the mother to tell the older children – who were not going to be kidnapped – to go to their room, where they would be drugged and locked inside the room. They would then take the three youngest children, and Reburn would kill both parents. Once the children were secured in their vehicle, they would drive away. Once Hayes, Reburn, and the defendant had safely returned to Maryland with the five children, the Amnotts would return to Florida with the child they had named “Caleb.” Hayes and Reburn would keep the other four children.

All five children to be kidnapped were less than eight years old. The defendant, Hayes, Reburn, and Jennifer Amnott were neither family members to the children, nor did they have any colorable claim for legal custody over the children.

### **IV. July 29, 2018 – The Home Invasion and Attempting Kidnappings**

The next morning, Sunday, July 29, 2018, the group considered proceeding with the plan as discussed, but the “hired hand” showed up again at the first house, and they decided again to wait until the evening.

According to subsequent text messages obtained by federal agents, throughout the day, Jennifer Amnott remained in consistent contact with the defendant and Hayes as they waited for the opportunity to enter the first house and discussed how to effectuate the kidnappings.

Jennifer Amnott was anxious during the wait, and was excited for the prospect of obtaining "Caleb." In anticipation of his arrival, she had purchased children's clothes.

When the family in the first house went to church on the morning of Sunday, July 29, 2018, Reburn and Hayes surreptitiously entered the home and familiarized themselves with the layout. Hayes also removed a dress and a cardigan, which she later used as a disguise. Hayes mentioned that she had already been inside the second house, so there was no need to also enter that home to gain similar knowledge. Subsequent investigation by agents of the Federal Bureau of Investigation confirmed that, in March 2018, Valerie Perfect Hayes had approached the family in the second house and falsely claimed to be an investigator for the United States military. Under this ruse, Hayes had asked for and received permission from the family to enter the home as she claimed to be searching for an active military member who had absconded.

As the evening of July 29, 2018 approached, Hayes and the defendant dropped Reburn off near the first house. Reburn surveilled the premises and then waited outside in the field until the lights went off. After the first house was dark, Hayes and the defendant approached in their vehicle, and turned off the headlights. Hayes and the defendant got out of the car and walked towards the front door, where Reburn met them. The defendant was carrying a 9mm Sig Sauer pistol and wearing gloves. Reburn was carrying a .45 caliber pistol.

Meanwhile, inside the house, Parents A and B, who are husband and wife, were in their residence with their two young children: Child #1, who was then two-years old, and Child #2, who was then less than one-year old.

As Parents A and B were preparing to retire for the evening, they observed a vehicle pull into their driveway and turn the vehicle lights off. Three individuals – two men and a woman – began to approach the house. Parent A went to the door, and opened it.

Hayes stood at the door, dressed in disguise to appear as a Mennonite. The defendant stood behind Hayes with a firearm in his hand, and after Parent A had opened the door, the defendant brandished it. When Parent A observed the firearm, he attempted to close the door to prevent entry into the home, but the defendant ran to the door and forced his way into the house. The defendant pointed the weapon at Parent A and told him to be quiet and to do as he was told. With Parent A subdued, Hayes and Reburn entered the home, both armed with firearms. Hayes began to look for Parent B and the two children. When Hayes could not find Parent B, she asked Parent A where he/she was located. Parent A told Hayes that he did not know.

Unbeknownst to Hayes, Reburn, and Amnott, when the defendant and his co-conspirators forced their way into the home, Parent B had grabbed the cordless cell phone and ran outside of the house. Hiding in a cornfield near the home, Parent B dialed 9-1-1 to report the incident and a deputy with the Rockingham County Sheriff's Office was immediately dispatched.

Prior to entering the house, Hayes, Reburn, and the defendant had devised a ruse to mislead the family into believing that they were not there to harm them. Specifically, they told Parent A they were merely looking for “documents” that had been left at the house by people who had lived there previously. In reality, this ruse made little sense to Parent A because his family had owned the home for generations.

Inside the house, Parent A was being held in gunpoint by the defendant and Reburn, at which point Parent A told them that “God is in control.” Reburn responded to Parent A with words to the effect of “this gun is in control.” At gunpoint, Reburn and the defendant forced Parent A to the basement. Once in the basement, they directed Parent A to lie down on the floor, and Parent A complied. Using a zip tie, Reburn bound Parent A’s wrists together, behind his back. Reburn went back upstairs, leaving the defendant with Parent A, who remained on his stomach on the basement floor with his hands tied behind his back.

Soon thereafter, in a response to the 911 call made by Parent B, who was still hiding in the cornfield, a deputy with the Rockingham County Sheriff’s Office arrived at the home with his blue lights flashing. Parent B came out of the cornfield to meet the deputy in front of her home. At the same time, Hayes – who was outside of the home – approached the deputy and told him that there was an armed man inside the house. Hayes falsely claimed to be a neighbor who was passing by and happened to see the armed man run inside. Parent B was confused and suspicious, as Hayes appeared to be the same woman who she saw at her front door and who forced entry into her home. Reburn joined Hayes at the front of the house, and the deputy told Parent B to go with Hayes and Reburn while he went inside the house.

The deputy entered the house and announced his presence. After clearing other areas of the upstairs, the deputy made his way to the basement. In the basement, the deputy found the defendant still holding Parent A at gunpoint. The defendant surrendered and he was taken into custody without incident.

In light of the deputy’s direction, when the deputy went inside the house, Parent B had agreed to get into the vehicle with Hayes and Reburn. When Parent B entered the vehicle, she noticed there was at least one child seat. Hayes and Reburn drove her to the nearby convenience store and dropped her off. Law enforcement officers subsequently obtained and reviewed surveillance footage from the store that evening, which captured a Mercedes Benz SUV consistent with size, model, and color as the silver 2011 Series 450 Mercedes Benz SUV of which Gary Blake Reburn is the registered title owner. Federal agents subsequently located this vehicle in self-storage in Maryland. In executing a search warrant, federal agents recovered from inside the vehicle, among other things, infants’ clothes, bottles, wipes, diapers, toys, a car seat, and a receipt for a generic version of Nyquil.

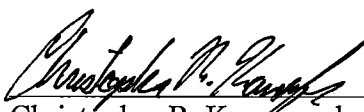
With the defendant having been apprehended by law enforcement, Hayes and Reburn returned to Maryland on the evening of July 29, 2018, where they rejoined with Jennifer Amnott. Because their plan at the first house had been thwarted by Parent B and law enforcement’s

intervention, they did not make their way to the second house as had been planned. Prior to July 29, 2018, the defendant and his co-conspirators had discussed the potential consequences if apprehended by law enforcement, to include the potential length of terms of incarceration, and whether the laws of the Commonwealth of Virginia allowed for the imposition of the death penalty.

In early August 2018, Hayes, Reburn, and Jennifer Amnott all fled the United States to the United Kingdom, where they have since been apprehended and are pending extradition.

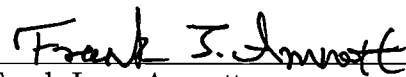
The actions taken by Frank Jesse Amnott as described above were taken knowingly and willfully. Amnott acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

Date: 12/11/19

  
Christopher R. Kavanaugh  
Assistant United States Attorney

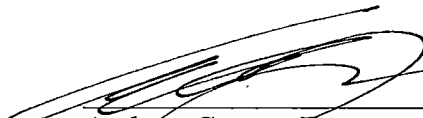
After consulting with my attorneys and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 12/11/19

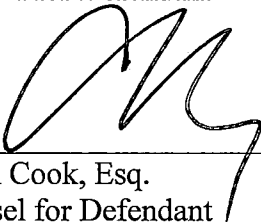
  
Frank Jesse Amnott  
Defendant

We are Frank Jesse Amnott's attorneys. We have carefully reviewed the above Statement of Facts with him. To our knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 12/11/19

  
Andrew Graves, Esq.  
Counsel for Defendant

Date: 12-11-19

  
Aaron Cook, Esq.  
Counsel for Defendant

 Defendant's Initials